

REMARKS

This amendment is filed in response to the Office Action dated June 15, 2004. Claims 1-18 and 20 are pending. In the Office Action of June 15, 2004, the Examiner rejected claims 1, 2, 6-12, 16-18 and 20 under 35 U.S.C. § 103(a) as being unpatentable over Dunko et al., U.S. Patent No. 6,553,236 ("Dunko") in view of Fitch et al., U.S. Patent No. 6,424,840 ("Fitch"). The Examiner rejected claims 3 and 13 under 35 U.S.C. § 103(a) as being unpatentable over Dunko in view of Fitch and further in view of Serbetciouglu et al., U.S. Patent No. 5,719,918 (Serbetciouglu). The Examiner rejected claims 4, 5, 14 and 15 under 35 U.S.C. § 103(a) as being unpatentable over Dunko in view of Fitch and further in view of Jampolsky et al., U.S. Patent number 6,625,437 (Jampolsky"). Notably, these rejections parallel the rejections made in the prior office action dated January 5, 2004, except that Fitch is newly added in each rejection.

By this amendment, all of the independent claims (claims 1, 11, and 20) are amended to more particularly and distinctly claim the invention. More specifically, each independent claim is modified to indicate that the zone type is one of a plurality of predefined zone types. Support for this amendment is found throughout the drawings, claims and specification, and in particular, in the specification at page 2, lines 29 through 32. As amended, the claims are distinguishable from the prior art, including Fitch. Indeed, as discussed further below, the prior art fails to disclose receiving a request for geographical zone data where the request includes a zone type of a plurality of predefined zone types.

In rejecting all of the claims, the Examiner relies upon Dunko as disclosing "a present location of remote members that identifies a type of predetermined geographical area (column 9, lines 31 - 32)." The Examiner analogizes this to the "zone type" specified in the claims, by indicating that the present location is a type of predetermined geographical area. While the present location is undoubtedly a geographical area, it is not a "zone type," as

that term is used in the claims. In particular, the present invention contemplates an interface that can be used to obtain many varieties or categories of location information. The prior art, Dunko and Fitch being examples, is concerned with returning one specific type of geographical data or a specific geographic location. The present invention advantageously contemplates using one interface, the recited request and reply, to be a universal interface for obtaining all kinds of geographical data. In order to be universal, a plurality of zone types are predefined. Then the zone types are used in the request to decipher the type of geographical data being requested. In contrast, the prior art presumes a specific type of data is always being requested. For example, Dunko assumes that the information being requested is a pinpoint (present) location. To obtain such information in accordance with the present invention, the request would need to include some type of identifier to indicate that the pinpoint location is the zone type. More precisely, according to the present invention, the request would have to include a particular zone type from among multiple predefined zone types. That is, in the example, the pinpoint zone type would merely be one zone type of other zone types, for example a ZIP code, state or other predefined area. Notably, the "pinpoint" zone type is different from the actual present location. The prior art fails to teach this "zone type of a plurality of predefined zone types," as required and recited in the independent claims.

Hence, the independent claims are novel, not obvious and patentable. The dependent claims are patentable for at least the reasons given above and their dependence on the patentable independent claims.

**CONCLUSION**

All pending claims are in condition for allowance. Allowance at an early date is solicited.

Respectfully submitted,



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